

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF VERMONT

2019 JUL 22 AM 10:29

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Civ. Action No. 2:19-cv-0057-cr

R# 4682021076

ATHENA and JANTHA WILLIAMS; BRIAN )  
and JUDY GLASS; ERIN and CHRISTY )  
MCCOMACK; RICHARD ROSARIO; TOBY )  
LEE RUTTER; ROMEAL and ANGELA )  
STEPHENS; EVETTE TRIBES; CALVIN and )  
SHERAE WALTON; VINCENT YI; ZANE )  
and KALONNA ZEIGLER; CECILIA )  
ILLIESIU; DOUGLAS and KATHY LEGER; )  
RONALD LEWIS; JOSEPH and LISA )  
MANNO; SHELLY ADAM and MEGAN )  
HENDERSON; GWENDOLYN )  
BARILLEAUX; TRACEY BURKE; KATIE )  
CUMMINGS and VERNON SAMS; SELMA )  
and MEHDI KSIBI; MARY MILLER; )  
MARILYN SANCHEZ and RODNEY )  
JOHNSON; and ANGELA MEDINA, )  
PATRICIA MEDINA, MONICA MEDINA, )  
and AUDRIE CANO, )

Plaintiffs, )

v. )

HOLIDAY INN )

HOLIDAY INN CLUB VACATIONS, )  
SILVERLEAF RESORTS, INC., ORANGE )  
LAKE RESORTS, and ORANGE LAKE )  
COUNTRY CLUB, INC., and DOES 1-5 )  
and ROE CORPORATIONS, 1-10, )

Defendants. )

**MOTION FOR ADMISSION *PRO HAC VICE* OF MARK E. FERRARIO, ESQ.**

I, Christopher D. Roy, Esq., counsel for Defendants Holiday Inn Club Vacations,  
Silverleaf Resorts, Inc., Orange Lake Resorts, and Orange Lake Country Club, Inc. (collectively,  
the "Orange Lake Defendants") in the above-captioned action, hereby move this Court pursuant

to Local Rule 83.1(b) to admit *pro hac vice* Mark E. Ferrario, Esq. of the Las Vegas, Nevada law office of Greenberg Taurig, LLP for the purposes of this case only. Mr. Ferrario's supporting affidavit accompanies this motion. Grounds for this motion are as follows:

1. I am a director in the law firm of Downs Rachlin Martin PLLC, 199 Main Street, P.O. Box 190, Burlington, Vermont. I am a member in good standing of the bar of the State of Vermont and of this Court. I am counsel for the Orange Lake Defendants in the above-captioned action and have entered my appearance.

2. Mr. Ferrario is a member of the law firm of Greenberg Taurig, 10845 Griffith Peak Drive, Suite 600, Las Vegas, NV 89135.

3. Mr. Ferrario is a member of the bar of the States of Nevada and California. He is also a member of the bar of the U.S. Supreme Court, the U.S. Courts of Appeals for the Ninth Circuit, and the U.S. District Court for the Districts of Nevada, and the North and Central Districts of California. He is a member in good standing and eligible to practice in each of the courts in which he has been admitted. He is not currently suspended or disbarred in any jurisdiction, and is not the subject of any disciplinary proceedings. *See Affidavit of Mark E. Ferrario, Esq.* (attached).

4. The Orange Lake Defendants seek the admission of Mr. Ferrario for the purposes of representing them in this action.

5. Mr. Ferrario will remain at all times associated in this case with the undersigned counsel in accordance with Local Rule 83.1(b)(4).

#### **MEMORANDUM OF LAW**

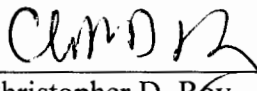
Pursuant to Local Rule 83.1(b), the Court has discretion to admit any member in good standing of a bar of another federal court, or of the highest court of any state, to practice in this

Court with respect to a particular action. Local Rule 83.1(b)(1) provides as follows: “Any attorney who is a member in good standing of the Bar of any federal court, or of the highest court of any state, may apply for *pro hac vice* admission.” This motion and Mr. Ferrario’s Affidavit show that Mr. Ferrario meets the requirements of Local Rule 83.1(b). Accordingly, Mr. Ferrario is qualified to appear as counsel *pro hac vice* for the purposes of this action.

WHEREFORE, the undersigned counsel prays that this motion to admit Mark E. Ferrario, Esq. *pro hac vice* be granted.

Dated at Burlington, Vermont this 17<sup>th</sup> day of July, 2019.

DOWNS RACHLIN MARTIN PLLC

By:   
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